

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 23-cv-20100-3  
Hon. Matthew F. Leitman

v.

D3, HEATHER IDONI,

Defendant.

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**ORDER APPOINTING STAND-BY COUNSEL  
FOR DEFENDANT HEATHER IDONI**

When Heather Idoni was arraigned in this case, the Magistrate Judge determined that she qualified for the appointment of counsel under the Criminal Justice Act and appointed counsel for her. (*See* Oder, ECF No. 11.) Idoni subsequently moved to represent herself, and the Court granted the motion. (*See* Order, ECF No. 93.) As a result, Idoni has been proceeding pro se in this action since May 22, 2023.

On March 20, 2024, the Court held the Final Pretrial Conference in this case. At the conference, Idoni explained to the Court that she has not been able to review discovery materials produced by the Government because she has been in custody in connection with a conviction in another federal criminal case, and she has been moved between various facilities. The Court has learned that Idoni is also scheduled to be sentenced in another federal criminal case in Nashville, Tennessee in July. That will result in additional movement of Idoni between custodial facilities.

Idoni's status as an inmate subject to movement poses serious challenges to her ability to prepare for trial. That status impedes her ability to receive and review discovery and to communicate with counsel for the other Defendants and for the Government. In addition, Idoni's circumstances impede her ability to communicate with the Court and to make filings on the Court's docket.

The Court concludes that Idoni needs the assistance of counsel to help with the logistics of obtaining discovery, making arrangements for effective review of the discovery, communicating with counsel for the other Defendants and for the Government, communicating with the Court, and making filings on the Court's docket. Accordingly, the Court appoints stand-by counsel for Idoni. The Federal Community Defender's Office shall assign a panel attorney from the CJA Panel to serve in this capacity.

The Court recognizes, respects, and will honor Idoni's request to represent herself, and thus the counsel appointed for her under this order shall play only a limited role on her behalf. Counsel shall assist with the matters outlined in the opening sentence of this paragraph (and other purely logistical matters), and in doing so must honor and implement Idoni's decisions about how to conduct her defense. And at trial, counsel shall serve only in a stand-by capacity.

**IT IS SO ORDERED.**

Dated: March 26, 2024

s/Matthew F. Leitman  
MATTHEW F. LEITMAN  
UNITED STATES DISTRICT JUDGE

I hereby certify that a copy of the foregoing document was served upon the parties and/or counsel of record on March 26, 2024, by electronic means and/or ordinary mail.

s/Holly A. Ryan

Case Manager

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